

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION (CINCINNATI)**

**H.H. FRANCHISING SYSTEMS, INC.,**

**Plaintiff,**

**v.**

**MISSIONERA LLC, VLADIMIR  
PETRENKO, and ELENA PETRENKO,**

**Defendants.**

**Case No. 1:24-cv-00160**

**Hon. Jeffery P. Hopkins**

**UNOPPOSED MOTION TO AMEND SCHEDULING ORDER**

Plaintiff H.H. Franchising Systems, Inc. (“HHFS”), by and through its attorneys, respectfully moves the Court to amend the May 15, 2025 Scheduling Order (Dkt. 50) to provide for an extension of the parties’ expert disclosure and report deadlines. In support of its unopposed motion, HHFS states as follows:

1. On May 15, 2025, the Court entered the Scheduling Order, which provided that plaintiff’s expert report must be made by October 10, 2025; defendants’ expert report must be made by November 24, 2025; and any rebuttal expert report must be made by December 23, 2025. (Dkt. 50.)

2. The parties are continuing to engage in discovery and require additional time to assess the need for, and to prepare, their expert reports.

3. The parties have conferred and agreed to extend the expert deadlines as follows:

- a. HHFS will produce its expert report on or by November 7, 2025;
- b. Defendants will produce their expert report by December 22, 2025;
- c. HHFS will produce any rebuttal report by January 6, 2026.

WHEREFORE, HHFS respectfully requests that the Court enter an order amending the Scheduling Order by extending the deadlines for expert reports as provided in the proposed order submitted herewith.

Dated: October 10, 2025

Respectfully submitted,

/s/ Charles J. Hoover

Aaron-Michael Sapp (*pro hac vice; trial attorney*)

Charles J. Hoover (*pro hac vice; trial attorney*)

**CHENG COHEN LLC**

363 West Erie Street, Suite 500

Chicago, Illinois 60654

(312) 243-1701

asapp@chengcohen.com

charles.hoover@chengcohen.com

-and-

Michael A. Galasso (0072470)

Robbins Kelly Patterson & Tucker, LPA

312 Elm Street, Suite 2200

Cincinnati, OH 45202

(513) 721-3330 | (513) 721-5001 fax

magalasso@rkpt.com

*Attorneys for H.H. Franchising Systems, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that, on October 10, 2025, I served the foregoing **UNOPPOSED MOTION TO AMEND SCHEDULING ORDER** via the CM/ECF system for the United States District Court for the Southern District of Ohio, thereby effectuating service upon all counsel of record.

/s/ Charles J. Hoover